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10 PIZZA ASIA VENTURES, INC.

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Plaintiff,

v.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING,  
LLC, a Delaware limited liability  
company; GUY KOREN, an individual;  
POTATO CORNER LA GROUP, LLC,  
a California limited liability company;  
NKM CAPITAL GROUP, LLC, a  
California limited liability company; J &  
K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California  
limited liability company; J&K  
VALLEY FAIR, LLC, a California  
limited liability company; J & K  
ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS,  
LLC, a California, limited liability  
company; GK CERRITOS, LLC, a  
California, limited liability company;  
J&K PC TRUCKS, LLC, a California  
limited liability company; and, GK  
CAPITAL GROUP, LLC, a California  
limited liability company and DOES 1  
through 100, inclusive,

Defendants.

Case No. 2:24-CV-04546-SB(AGRx)

*The Hon. Stanley Blumenfeld, Jr.*

**FURTHER JOINT STATUS  
REPORT OF PLAINTIFF AND  
DEFENDANTS REGARDING  
ONGOING MEET AND CONFER  
DISCUSSIONS**

Complaint Filed: May 31, 2024  
Trial Date: August 4, 2025

1 PCJV USA, LLC, a Delaware limited  
2 liability company; PCI TRADING LLC,  
3 a Delaware limited liability company;  
4 POTATO CORNER LA GROUP LLC,  
5 a California limited liability company;  
6 GK CAPITAL GROUP, LLC, a  
California limited liability company;  
NKM CAPITAL GROUP LLC, a  
California limited liability company; and  
GUY KOREN, an individual,

7 Counter-Claimants,

8 v.

9 SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

10 Counter Defendant.

12 PCJV USA, LLC, a Delaware limited  
13 liability company; PCI TRADING LLC,  
14 a Delaware limited liability company;  
POTATO CORNER LA GROUP LLC,  
15 a California limited liability company;  
GK CAPITAL GROUP, LLC, a  
California limited liability company;  
NKM CAPITAL GROUP LLC, a  
16 California limited liability company; and  
GUY KOREN, an individual,

17 Third Party Plaintiffs,

18 v.

19 PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a  
21 California corporation; CINCO  
CORPORATION, a Philippines  
corporation; and DOES 1 through 10,  
22 inclusive,

23 Third Party Defendants.

## **JOINT STATEMENT**

Pursuant to this Court’s Orders of March 4 and 11, 2025 (Dkt. #117 and #122), Plaintiff Shakey’s Pizza Asia Ventures, Inc. (“Plaintiff”) and Defendants PCJV USA, LLC and Guy Koren (collectively, “Defendants”) submit the following further status report, regarding their ongoing meet and confer efforts to resolve (1) “any outstanding violations of the Court’s preliminary injunction,” and (2) “the amount of reasonable attorney’s fees to award to Plaintiff in connection with its contempt motion.”

As to the first issue, Plaintiff is satisfied that, with one exception, the ongoing and “outstanding violations of the Court’s preliminary injunction” raised at the February 28, 2025 hearing have been addressed by Defendants. As such, Plaintiff is satisfied that Defendants have achieved substantial compliance.

Plaintiff contends that one remaining issue is not currently believed to be an issue of contempt, as it does not, on its own, reveal a knowing intent to refuse compliance with the injunction. That issue involves an admitted non-compliance, with respect to fixed signs displaying the trademarks at issue that Defendants represent have not yet been covered, removed, or replaced due to the need, Defendants contend, for landlord approval. Plaintiff does not currently believe this indicates contemptuous non-compliance, but, instead a good faith dispute as to whether a landlord's approval constitutes sufficient "impossibility" that it trumps this Court's authority to enforce an order that the sign constitutes a likely violation of the Lanham Act and is to be removed. In addition to not being an issue of contempt it may also become moot. If the signs that remain on display continue in place, this issue may be raised for resolution, however, it does not, at this time, appear to Plaintiff as being an issue of contempt any longer.

Based on the foregoing, then, **Plaintiff and Defendants can now affirmatively represent to the Court that the issue of whether the ongoing**

noncompliance constitutes a contempt has been resolved, and they do not believe an evidentiary hearing on ongoing contempt is necessary.

With respect to the issue of the amount of fees to be ordered, Plaintiff and Defendants have continued their negotiation since the last Status Report, but have not yet agreed on a number. Each has proposed a number, and they are negotiating in good faith as to where the compromise number lies. They are sharing and considering additional information and are hopeful that such a compromise will be made. Such a compromise will include payment of the fees ordered on the Anti-SLAPP motion as well.

If, by one week from Friday, March 21, 2025, no compromise has been struck, Plaintiff and Defendants respectfully request that the Parties prepare a Joint Statement not to exceed more than 3 pages per side (excluding exhibits), for either this Court, or if this Court prefers, the Magistrate, to consider for resolution.

Dated: March 12, 2025

FOX ROTHSCHILD LLP

*/s/ Michael D. Murphy*

Michael D. Murphy

Jordan Zolliecoffer  
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Attorneys for Plaintiff SHAKEY'S  
PIZZA ASIA VENTURES, INC.

DATED: March 12, 2025

BLANK ROME LLP

By:/s/ *Arash Beral*

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Arash Beral

Todd Malynn  
Wise 1

Victor Sandoval  
f. D. f. 14

## Attorneys for Defendants

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on March 12, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: March 12, 2025

FOX ROTHSCHILD LLP

/s/ Michael D. Murphy  
Michael D. Murphy  
Attorneys for Plaintiff SHAKEY'S  
PIZZA ASIA VENTURES, INC.